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5 **IN THE UNITED STATES DISTRICT COURT**
6 **WESTERN DISTRICT OF WASHINGTON**
7 **SEATTLE DIVISION**

8 MEGAN SMITH, on behalf of herself and
9 all others similarly situated,

10 Plaintiff,

11 v.

12 AMAZON.COM, INC.,

13 Defendant.

14 Case No. 2:21-cv-00838

15 **NOTICE OF RELATED CASE**

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Pursuant to LCR 3(g)(1), Plaintiff hereby submits this notice of a pending, related case in the Western District of Washington. The related case is *Deborah Frame-Wilson, et al. v. Amazon.com, Inc.*, 2:20-CV-00424-RAJ, assigned to Judge Richard A. Jones.

The cases involve substantially similar parties, transactions and events. Both cases allege anticompetitive conduct against Amazon, based on the same contractual relations. Whereas the earlier filed *Frame-Wilson* case alleges that Amazon's conduct harms persons who made purchases through any other retail e-commerce channel in the United States other than the Amazon.com platform, this action alleges that Amazon's conduct harms persons who made purchases through the Amazon.com platform.

Because there is substantial overlap in the cases' factual allegations concerning the substance and impact of the Defendant's conduct, a determination of relatedness would eliminate substantial duplication of effort and expense, delay, and undue burden on the Court, parties and witnesses. Equally, because both cases assert similar theories of antitrust liability and injury, a determination of relatedness also alleviates the risk of potentially conflicting orders.

DATED: June 23, 2021

Respectfully submitted,

PHILLIPS LAW FIRM, PLLC

/s/ R. Glenn Phillips

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